

**Alliance to Restore Our Waterways**  
**Thursday, April 27, 2017**  
**3:00 to 4:00 pm**

**Background:** Alliance to Restore Our Waterways (AROW) is a coalition of companies that are Potentially Responsible Parties (PRPs) and groups that are affected by cleanups of contaminated sediment Superfund sites. The group will discuss ways to improve implementation of the Superfund program.

Contaminated sediments, including PCBs and mercury, can impair the navigational, commercial, and recreational uses of rivers and other waterways and they pose unique cleanup challenges. Remedies above \$25 million are reviewed EPA's National Remedy Review Board (NRRB). In 2000, the National Academy's National Research Council issued a report recommending EPA apply risk-management principles to addressing contaminated sediments.

EPA issued a memorandum in 2002 identifying 11 risk-management principles to guide cleanup of contaminated sediment sites, including clarifying that there is no presumptive, one-size fits all remedy and that remedies should be tailored to the specific risks posed at a site. The 2002 memorandum also established a Contaminated Sediments Technical Advisory Group (CSTAG) to monitor and provide advice on the largest, most complex sediment sites. EPA issued detailed technical guidance in 2005 for cleaning up contaminated sediment sites.

There are about 90 Superfund sediment sites, including 17 that are being tracked by CSTAG. These include the Gowanus Canal (NY), Lower Passaic (NJ), Lower Duwamish (WA), and Portland Harbor (OR) sites.

**Attendees:**

- Rich Gold, Partner, Holland & Knight and Executive Director of AROW
- Marissa Serafino, AROW
- Mary Draves, Dow, Global Director, Environmental Remediation and Restoration
- Dennis Deziel, Dow, Director of Government Affairs
- Evan Van Hook, Honeywell, Global VP for Health, Safety, Environment and Sustainability
- Larry Kast, Honeywell, VP of Government Relations
- Darren Collins, Celanese, VP of Manufacturing and EHS
- Stephanie Daigle, Celanese, VP of Government Affairs
- Steve Shestag, Boeing, Director of Enterprise Remediation
- Peter Pagano, Boeing, Director of Environment
- Steve Goldberg, BASF, VP for Regulatory Law and Government Affairs
- Doug Reid-Green, BASF, Remediation Expert
- Peter Saba, Schnitzer Steel, SVP and General Counsel
- Mat Cusma, Schnitzer Steel, Director of Environmental Remediation
- Tara C. Parker, ExxonMobil, Global Manager of Environmental Services
- Robert Nolan, ExxonMobil, Senior Government Relations Advisor

**Issues:** AROW (along with other stakeholders, including Congress) have raised questions about the reliance on dredging, the lack of consistency across regions, and whether the 11 risk-management principles outlined in the 2002 memorandum are still being followed when EPA selects remedies for Superfund sites. GAO issued a report in 2016 recommending EPA improve documentation of risk-management principles and NRRB/CSTAG review procedures. AROW recommends several reforms to improve operation of Superfund program and reduce cleanup costs:

- Change delegation so remedies above \$100 million must be approved by Administrator
- Reevaluate RODs for above \$100 million where remedy is not in construction phase (ie., Portland Harbor)
- Require adherence to NRRB and CSTAG recommendations and greater public participation in review process